

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEBRASKA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

JONATHAN DANIEL ROONEY,

Defendant.

8:20CR104

UNITED STATES MOTION FOR  
UPWARD VARIANCE

COMES NOW the United States of America, by and through the United States Attorney and the undersigned Assistant United States Attorney and moves this Court for an upward variance from the 135 – 168 months’ imprisonment guideline range to a sentence of 420 months. In support of this motion, the United States has contemporaneously filed a Sentencing Memorandum and Brief in Support of this Motion for Upward Variance.

UNITED STATES OF AMERICA, Plaintiff

JAN W. SHARP  
United States Attorney  
District of Nebraska

By: s/ Lecia E. Wright  
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CERTIFICATE OF SERVICE

I hereby certify that on February 25, 2022, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which sent notification of such filing to all registered participants.

s/ Lecia Wright  
Assistant U.S. Attorney